Eric F. Pastor
Pastor, Behling & Wheeler, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-05-05
Groundwater Data and Proposed Monitoring Wells

Dear Mr. Pastor,

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the "Groundwater Data" and proposed monitoring wells dated January 19, 2007. With this letter, the EPA approves the planned work with the enclosed modifications. Therefore, the Respondents are authorized to proceed with these activities for the Gulfco site.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller, P.E.
Remediation Project Manager

Enclosure

cc: Luda Voskov (TCEQ)
Barbara Nann (6RC-S)

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Gulfco Marine Maintenance Superfund Site (Site)

Modifications:

1. (Figure 1 & Figure 2): Data from the eight temporary piezometers, HMW-1, 2, and 3, and MW-1, 2, and 3 were not included in the potentiometric contouring. A discussion shall be provided in the Remedial Investigation Report explaining why these were excluded from the development of the potentiometric surface.

2. (Proposed Zone A Wells, p. 2): There is no Zone-A monitoring well proposed for the area downgradient (west) from the MW-01 and PZ-04 sample locations. Both of these samples included a number of chemicals that exceeded their screening levels, and an additional monitoring well there is necessary to define the contamination extent and to determine direction of groundwater flow in that area. An additional monitoring well shall be installed in this area, which is west of MW-01 and adjacent to new Zone-B monitoring well MW-23B. The analyte list for this additional well shall be the same as for MW-20 and MW-21, as modified by the comment below.

3. (Proposed Zone-A Wells, p. 2): There is no Zone-A monitoring well proposed for the southern corner of the former impoundment area, where temporary piezometer PZ-04 was located. The groundwater sample from this piezometer contained some of the highest contaminant concentrations, and a permanent monitoring well at this location would allow verification of the results. An additional monitoring well shall be installed in this area, in the vicinity of temporary piezometer PZ-04. The analyte list for this additional well shall be the same as for MW-20 and MW-21, as modified by the next comment.

4. (Table 2): The groundwater analyte list for proposed wells MW-20 and MW-21, which are located downgradient from the former impoundments, does not include carbon tetrachloride or toluene. Both of these chemicals were detected above their screening levels in the sample from PZ-04, which is located adjacent to the former impoundments on the southern corner. The analyte list for proposed wells MW-20 and MW-21, and the two additional monitoring wells in previous comments, shall include carbon tetrachloride and toluene in addition the other analytes listed in Table 2.

5. Soil samples collected near the former impoundments could identify the presence or absence of NAPL. Sampling shall be done where the presence of NAPL is indicated in accordance with Section 3.6.2, page 13, and Section 5.5.1.1, page 24, of the Field Sampling Plan. Soil samples shall also be collected from borings where the presence of NAPL is indicated. These soil samples shall be analyzed for VOCs, SVOCs, and pesticides.

6. (Proposed Zone-B Wells, p.3): The screen length for the Zone-B wells is not provided. The plan shall include a maximum screen length of 10-feet. The rational for setting depth for

the screen shall require that if the Zone-B sand is more than 10-feet thick, then set the screen so that the most permeable sand intervals, based on visual assessment, are included, and any identified NAPL zones are included; but if the best sand intervals and any NAPL zones cannot all be covered within the 10-foot screen, then ensure that the NAPL zones are included.

7. (Proposed Zone-B Wells p.3): The Zone-B wells are to be isolated from Zone-A with an isolation casing string installed and grouted into the confining clay below Zone-A. "Casing hammer" and "sonic drilling" techniques are listed as alternatives to be employed. These alternative methods may not provide the same quality of isolation between the two zones, which is important to prevent any contamination from migrating downward at the well. The alternative methods shall not be used without further explanation and discussion with EPA.

8. (Proposed Zone-B Wells, p.3): The screening values to be used for each groundwater zone are based on whether it is a potable water zone. The plan shall include a provision for measuring the salinity of the Zone-B water samples and analyzing one groundwater sample for total dissolved solids.

9. (Proposed Zone-B Wells, p. 3): The last sentence on page 3 states that a boring will never be advanced through a low-permeability zone where elevated contaminants are present in the overlying zone. This last sentence shall be deleted. It may be necessary to install monitoring wells into deeper zones to determine the extent of contamination, and appropriate measures (i.e., grouting isolation casing strings in clay layers) shall be taken to prevent the spread of contamination at the well.

10. In the Remedial Investigation and Feasibility Study Work Plan, it was suggested that natural attenuation may be an important process in remediating the site. It would be beneficial to collect additional water quality information to evaluate these processes. The plan shall include provisions to measure dissolved oxygen and oxidation-reduction potential during the water sampling activities.